

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

**In re:**

**MARIBELE OSORIO RIVERA**

**Debtors**

**CASE NO. 16-03461 (BKT)**

**Chapter 13**

**OBJECTION TO CONFIRMATION OF PLAN**

TO THE HONORABLE COURT:

COMES NOW **BANCO POPULAR DE PUERTO RICO, SERVICER FOR FREDDIE MAC** (hereinafter “Banco Popular”), represented by its undersigned attorney, and very respectfully alleges, states and prays:

1. On April 29, 2016, Debtors filed a petition for relief under Chapter 13 of the Bankruptcy Code.

2. On April 26, 2016 (Docket No. 2), Debtors also filed a Chapter 13 plan dated April 29, 2016; providing for 20 monthly payments of \$700.00 and 40 final monthly payments of \$870.00 to the Chapter 13 trustee, for a total plan base of \$48,800.00.

3. On May 19, 2016 (Claim No. 5), Banco Popular filed a secured claim in the amount of \$165,732.00, with prepetition arrears of **\$696.80**, regarding loan #2357, secured by a first mortgage in the principal amount of \$176,000.00 over Debtor’s real property at 183 Ramal 788 KM 6.3 Bo. Tomas de Castro #1, in Caguas, Puerto Rico.

**Banco Popular’s objection to confirmation**

4. Banco Popular objects to the confirmation of the plan dated April 29, 2016.

(a) Debtor’s proposed plan has no provision as to Banco Popular’s Claim No. 5.

(b) Any amended Chapter 13 plan must also provide for the payment of \$500.00 to Banco Popular for the legal expenses it has incurred in the filing and prosecution of this objection to confirmation.

**WHEREFORE**, it is respectfully requested that this Honorable Court enter an order denying the confirmation of Debtor's plan dated April 29, 2016.

**WE HEREBY CERTIFY** that a true and correct copy of the foregoing has been filed electronically on this day with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to Roberto Figueroa Carrasquillo, Esq., [cmecf@rfclawpr.com](mailto:cmecf@rfclawpr.com), and to Alejandro Oliveras Rivera, Esq., Chapter 13 trustee, [aorecf@ch13ju.com](mailto:aorecf@ch13ju.com).

In San Juan, Puerto Rico, this 19<sup>th</sup> day of May, 2016.

s/SERGIO A. RAMIREZ DE ARELLANO  
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